

# Privacy, Learner Access to Records and Record Keeping Policies

## Policy Statement

Nationwide Training is committed to protecting the privacy and personal information of clients and staff alike. We will not disclose, sell or pass on your personal details in any way, without your written consent, other than for the legislated purposes stated below.

## Legislation

Nationwide Training has undertaken to comply with the requirements of the Privacy Act 1988, including in particular, the 13 Australian Privacy Principles 9APPs that fall under this Act.

## Legislated Data Reporting

As a Registered Training Organisation, Nationwide Training is required to report on data it obtains from its learners to State and/or Federal Government agencies for reasons such as research, statistical analysis and the generation of performance reports for RTOs so they may gain a better understanding of their standing with other RTOs in relation to customer satisfaction.

Information RTOs are required to share includes the courses and subjects in which learners are enrolled, their age and gender, details of where they were born and went to school.

The data collected by the RTO must conform to the Australian Vocational Education and Training Management Information and Statistical Standard (AVETMISS). Following AVETMISS guidelines allows for there to be a benchmark in vocational education and training (VET) measurement that in turn provides a more accurate and defined picture of what is happening in the sector.

It enables comparison and analysis at all levels of the training system, nationally and within each state and territory. Nationwide Training collects this information from learners through the issuing of its Enrolment Form provided upon expression of interest in any of our courses.

Information about a learner, except as required by law or as required under the Standards for Registered Training Organisations (RTOs) 2015, is not disclosed without the learner's written permission and that of their parent or guardian if the learner is under 18 years of age. Where a learner/guardian consents to disclosure of information outside of that required by law, they will be requested to complete the Permission to Disclose Information Form, which provides specific information around what is to be disclosed and to whom. A copy of the completed form will be kept in their learner file.

Learner files are kept in secure facilities at Nationwide Training offices with access restricted to only key RTO personnel. All RTO personnel are required to sign a Confidentiality Declaration upon being appointed by the company.

Learner assessment records are retained in a secure location for a period of 30 years in accordance with current Federal and State legislation, before being destroyed.

Learners are encouraged to keep the RTO abreast of changes to their personal circumstances so that information held on file is accurate and the most recent available.

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## Learner Access to Records

Nationwide Training is able to provide learners with copies of information held about them at their request. Please provide adequate notice (at least one week) in this regard.

### Learner Access to Records Procedure

- Learner to complete a Request for Information Form;
- Completed form to be submitted to RTO Administration Department;
- Allow 1 week for processing;
- RTO to contact learner when information is ready for collection;
- Administration to sign off that information has been collected.

## Record Keeping

Nationwide Training stresses the importance of accurate and consistent record keeping with its entire staff. Record Keeping is conveyed as being an integral aspect of the company's compliance obligations under the Standards for Registered Training Organisations (RTOs) 2015.

### Learner Information

Records of the following, amongst other items, are maintained:

- Learner enrolment records
- Learner attendance records
- Learner assessment records
- Learner work
- Learner/Employer Workplace Agreements
- Learner workplace experience and learning
- Fees paid and refunds given
- Details of complaints and appeals

The above records will be kept for:

- a period of 2 years; *or*
- the duration of the learner's enrolment; *or*
- the duration of an Appeal application,

whichever is the longer period.

Records of results, qualifications and Statements of Attainment for all learners are stored in individual learner files and the nominated Student Management System at a central location. These records and records of summary assessment sheets will be kept for a period of 30 years.

In the event that Nationwide Training ceases to operate, it will transfer, within 5 working days, all records to the Registering Body and ensure all learners have all received a copy of their records.

### Collection of Information

Personal information will not be collected unless the information is collected for a purpose directly related to a learner or staff member and the collection of the information is necessary for or directly related to the purpose of interaction between Nationwide Training and the learner or staff member.

Personal information will not be collected by unlawful or unfair means.

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Where personal information is collected for inclusion in a record or in a generally available publication Nationwide Training will take reasonable steps to ensure that, before the information is collected or, if that is not practicable, as soon as practicable after the information is collected, the individual concerned is generally aware of:

- The purpose for which the information is being collected;
- If the collection of the information is authorised or required by or under law the fact that the collection of the information is so authorised or required; and
- With whom the information may be shared (such as the Australian Government or Tuition Assurance Scheme).

Where Nationwide Training solicits and collects personal information for inclusion in a record or in a generally available publication it will take reasonable steps to ensure that:

- The information collected is relevant to that purpose and is up to date and complete;
- The collection of the information does not intrude to an unreasonable extent upon the personal affairs of the individual.

Learners are encouraged to liaise with Nationwide Training staff to ensure their details are accurate and up to date.

## Student Management System

Nationwide Training has purchased and implemented the use of an AVETMISS compliant Student Management System (SMS). Certain nominated staff within Nationwide Training are specifically trained in how to record and extract data related to learners and our training services.

Information that the SMS is able to record, amongst other things, include:

- Learner demographics like age, sex, ethnicity and disability information
- Personal details, e.g. address, phone numbers, etc.
- Course selection of each learner
- Training Progress Reports for each learner
- Assessment outcomes for each learner
- File notes of all interactions and communications with the learner
- Payment and refund details
- Copies (scanned or photo) of certificates / qualification / Statement of Attainment issued
- Disciplinary actions (if applicable)
- Details of complaints and appeals

## File Notes

Nationwide Training implements a File Note Policy with regard to learner records and information. Any changes to a learner's enrolment or training activities will be captured using a File Note system that will include the date, a short description of the relevant item and the name of the person who actioned it.

File notes will be kept against a learner's enrolment on the Student Management System. Hard copy file notes may also be kept in the learners hard copy file as appropriate.

## Electronic Back Up

Electronic files are kept up to date and backed up regularly each day. The backup copy is to be kept offsite or in a fireproof and flood-proof safe.

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## Privacy

All records are dealt with in accordance with Nationwide Training's Privacy, Learner Access to Records and Record Keeping Policies.

## Secure Disposal of Records

Nationwide Training will dispose of all records which house sensitive information, or information about its learners or staff members, in a secure manner. This may include leasing a locked, document disposal waste bin or other machinery as required.

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